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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Simeon Washa Amen Ra, Ex rel
SIMEON LEWIS
Plaintiff

vs.

INTERNAL REVENUE SERVICE,
UNITED STATES
Defendant, Respondent

} Case No: 14-cv-8295

} Honorable John Z. Lee

FILED

SEP 15 2015

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT AND
REPLY TO DEFENDANT**

NOW COMES, Plaintiff Simeon Washa Amen Ra, respectfully files this Motion for leave to amend his complaint.

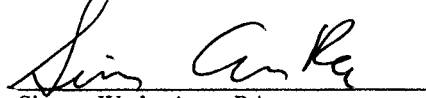
Plaintiff would also like for this motion for leave to serve as his reply to Defendants RESPONSE TO PLAINTIFF'S MOTION TO RECONSIDER DISMISSAL OF COUNTS [Doc #24], so that Plaintiff is in compliance with Judges scheduling order. [Doc #23]

Plaintiff believes that the request for leave should be granted based on the following:

1. Plaintiff filed the present action on October 22, 2014.
2. Defendant filed their answer to Plaintiff's complaint on December 24, 2014
3. This is Plaintiff's first request for leave to file an amended complaint.
4. This request for leave will not prejudice opposing party in any way.
5. This case is not scheduled for trial.

Wherefore Plaintiff respectfully requests that this court enter an order granting Plaintiff's Motion for leave. Plaintiff is asking for thirty days (30) leave.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Simeon Washa Amen RA', written over a horizontal line.

Simeon Washa Amen RA
Post Office Box 199273
Chicago, Illinois near [60619-1016]

Dated September 15, 2015

CERTIFICATE OF SERVICE

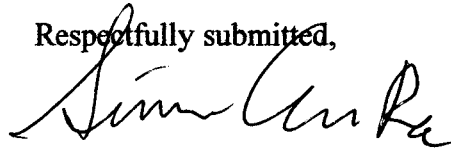
The undersigned, Pro se of record for the plaintiff, hereby certifies that on September 15, 2015, he served a copy of the above **PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT** with the Clerk of the Court, and the same was served on the following:

Prashant Kolluri
United States Attorney's Office
219 South Dearborn Street
5th Floor
Chicago, IL 60604

Bradley A. Sarnell
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 55
Washington D.C. 20044

By regular mail: USPS

Respectfully submitted,



/s/ simeon washa amen ra

P.O. Box 199273

Chicago, Illinois 60619